BEFORE THE RECEIVED POSTAL RATE COMMISSION 12 16 PM *01

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

NOTICE BY UNITED PARCEL SERVICE OF INTERVENTION AS A PARTY UNDER COMMISSION RULE 20 (September 28, 2001)

> John E. McKeever Phillip E. Wilson, Jr. Attorneys for United Parcel Service

Service of two copies should be made by hard copy upon:

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OF INTERVENTION AS A PARTY UNDER COMMISSION RULE 20

Pursuant to Section 20 of the Commission's Rules of Practice, 39 C.F.R. § 3001.20, United Parcel Service ("UPS") hereby gives notice of its intervention as a party in this proceeding and states the following in support of its intervention:

- UPS provides parcel delivery services throughout the United States via air and ground operations. UPS also provides expedited letter delivery services and international delivery services.
- 2. UPS competes with the United States Postal Service (the "Postal Service") and is concerned about and affected by the application of the Postal Reorganization Act of 1970, as amended, 39 U.S.C. § 101 *et seq.*, in all areas where the Postal Service competes with private enterprise.
- 3. UPS is also a substantial user of postal services, especially First Class Mail.
- 4. As a competitor of the Postal Service and as a user of postal services, UPS will be affected by and is interested in the changes in rates, fees, and

classifications proposed by the Postal Service in this proceeding. In particular, UPS is interested in ensuring that the changes in rates, fees, and classifications recommended by the Commission comply with the policies of the Postal Reorganization Act and the factors set forth in Sections 3622 and 3623 of the Act.

5. UPS requests a hearing and intends to participate actively in a hearing in this proceeding.

WHEREFORE, United Parcel Service respectfully gives notice that it is intervening as a full party in this proceeding.

Respectfully submitted,

John E. McKeever Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

Phillip E. Wilson, Jr.

Attorney for United Parcel Service

Dated: September 28, 2001

Philadelphia, Pa.